

1 BARBARA HART (*pro hac vice*)
DAVID C. HARRISON (*pro hac vice*)
2 JEANNE D'ESPOSITO (*pro hac vice*)
LOWEY DANNENBERG COHEN & HART, P.C.
3 One North Broadway, Suite 509
White Plains, NY 10601-2310
4 Telephone: 914-997-0500
Facsimile: 914-997-0035

5 *Lead Counsel for the New York City Pension Funds and the P*

6 WILLEM F. JONCKHEER S.B.N. 178748
7 SCHUBERT JONCKHEER KOLBE & KRALOWEC LLP
Three Embarcadero Center, Suite 1650
8 San Francisco, CA 94111
Telephone: 415-788-4220
9 Facsimile: 415-778-0160

10 *Local Counsel*

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

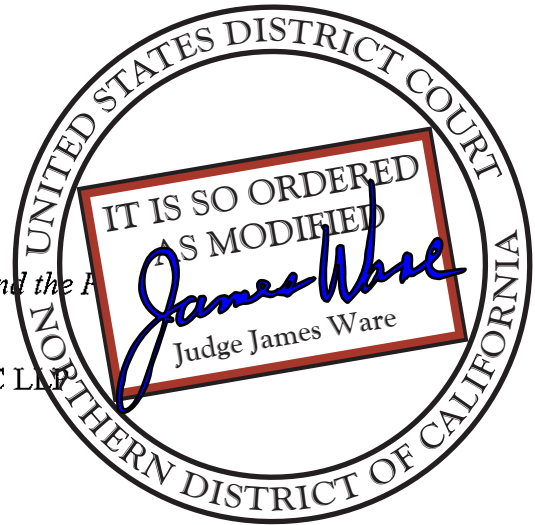
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16 IN RE JUNIPER NETWORKS, INC.
SECURITIES LITIGATION

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18 This Document Relates to:

19 All Actions

No. C 06-04327-JW

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**STIPULATION AND [PROPOSED] ORDER
SETTING DEADLINE FOR PARTIES TO
FILE JOINT STATUS REPORT RE:
DISCOVERY**



1 This Stipulation is entered into by and among Lead Plaintiff the New York City Pension
 2 Funds, defendants Juniper Networks, Inc., Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert
 3 M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton Sclavos, Vinod Khosla,
 4 Kenneth Levy, and William R. Stensrud and defendant Ernst & Young, by and through their
 5 respective attorneys of record.

6 WHEREAS, on November 3, 2008, the parties filed the Discovery Plan which was
 7 entered by the Court on November 17, 2008. The Discovery Plan, among other things, set
 8 deadlines for fact and expert discovery and summary judgment motions as follows:

ACTION	DUE DATE
Fact discovery cut-off	December 1, 2009, subject to review
Exchange of expert reports	February 1, 2010
Exchange of rebuttal expert reports	60 days after exchange of expert reports
Expert deposition deadline	60 days after exchange of rebuttal reports
Dispositive motion cut-off	No later than 45 days after close of expert discovery

14 WHEREAS, following the entry of the Discovery Plan, the parties in this action (the
 15 "Juniper Action") have engaged in substantial document discovery; and have begun deposition
 16 discovery;

17 WHEREAS, in light of the foregoing, counsel for the parties request that the Court
 18 schedule a joint case management conference to follow the September 14, 2009 hearing on class
 19 certification to address the Discovery Plan deadlines and related discovery matters;

20 WHEREFORE, the parties stipulate, and request the Court to order, as follows:

- 21 1. The parties in the Juniper Action shall appear for a case management
 22 conference immediately following the 9:00 a.m. September 14, 2009 class
 23 certification hearing scheduled before Judge Ware.
- 24 2. The parties shall file a joint case management statement on or before
 25 September 4, 2009.

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 27 SO STIPULATED.
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1 Dated: August 17, 2009

LOWEY DANNENBERG COHEN & HART, P.C.

3 By: _____/s/

4 David C. Harrison
5 One North Broadway, Suite 509
6 White Plains, NY 10601-2310
Telephone: (914) 997-0500
Facsimile: (914) 997-0035
Attorneys for Lead Plaintiffs

7 I, David C. Harrison, am the ECF user whose ID and password are being used to file this
8 Stipulation and [Proposed] Order Scheduling Case Management Conference. In compliance
9 with General Order 45, X.B., I hereby attest that Joni Ostler has concurred in this filing, and I
10 have her manual signature on file.

11 Dated: August 17, 2009

WILSON SONSINI GOODRICH & ROSATI

12 By: _____/s/

13 Nicki Locker
14 Joni Ostler
15 650 Page Mill Road
16 Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100
Counsel for the Juniper Defendants

17 I, David C. Harrison, am the ECF user whose ID and password are being used to file this
18 Stipulation and [Proposed] Order Scheduling Case Management Conference. In compliance
19 with General Order 45, X.B., I hereby attest that Vivianne Stapp has concurred in this filing, and I
20 have her manual signature on file.

21 Dated: August 17, 2009

LATHAM & WATKINS

22 By: _____/s/


23 David Friedman
24 Vivianne Stapp
25 505 Montgomery Street, Suite 2000
San Francisco, CA 94111-6538
Telephone: 415-391-0600
Facsimile: 415-395-8095
Counsel for Defendant Ernst & Young

26 * * *

*** ORDER ***

Upon evaluation of the parties' Stipulation, the Court finds that prior to setting a Further Case Management Conference, it would be fruitful for the Court to receive and review the parties' Joint Status Report re: Discovery. Accordingly, on or before **September 4, 2009**, the parties shall file their Joint Status Report. The Report shall include, among other things, an update on the parties' discovery efforts and if relevant, any request for modification of the current Case Schedule. Upon reviewing the parties' Joint Status Report, the Court will set a Conference to coincide with the hearing on Plaintiffs' Motion for Class Certification, if necessary.

Dated: September 1, 2009


JAMES WARE
United States District Judge